UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: LOWER MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH) (ALL CASES)

NOTICE TO TAKE DEPOSITION UPON ORAL QUESTIONS

PLEASE TAKE NOTICE, that on May 4, 2013, at 10:00 o'clock A.M., at the office of Veritext, located at 1250 Broadway, Suite 2400, New York, New York 10001, attorneys for the plaintiffs herein will take the deposition of CHARLES MEHLMEN, senior vice president and general manager of Lefrak Organization, Inc. and Hudson Towers Housing Co. Inc., on oral examination before an officer duly authorized by law to administer oaths and the deposition will be recorded by videotape and stenographically in regard to the work at 400 Gateway Plaza. The deposition shall continue day to day until completed. The deposition shall be used for discovery purposes and may be introduced as evidence at the trial of the above-entitled action.

Dated: New York, New York March 27, 2013

Worby Groner Edelman & Napoli Bern, LLP Certain Plaintiffs' Counsel

By:

Christopher R. LoPalo (CL-6466)

350 Fifth Avenue, Ste. 7413 New York, New York 10118 (212) 267-3700

To: See Attached Service List

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: LOWER MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH) (ALL CASES)

## **CERTIFICATE OF SERVICE**

I, Christopher R. LoPalo, an attorney duly licensed to practice before the Courts of the State of New York herby declares that I served a true copy of the within **NOTICE TO TAKE DEPOSITION UPON ORAL QUESTIONS** to all counsel on the Service List attached hereto. Service was effected by electronic mail.

This the 27<sup>th</sup> day of March 2013

Christopher R. LoPalo (CL-6466)

## **SERVICE LIST**

Lee Ann Stevenson, Esq. Kirkland & Ellis, LLP Citigroup Center 153 East 53rd Street New York, New York 10022 lstevenson@kirkland.com

Gregory J. Cannata, Esq.
Robert Grochow, Exq.
Gregory J. Cannata & Associates
233 Broadway, 5th Floor
New York, New York 10279
Cannata@cannatalaw.com
RGrochow@aol.com

James J. Tyrrell, Esq.
Joseph E. Hopkins, Esq.
Alyson Villano, Esq.
Patton Boggs, LLP
The Legal Center
One Riverfront Plaza
Newark, New Jersey 07102
jtyrrell@pattonboggs.com
jhopkins@pattonboggs.com
AVillano@PattonBoggs.com

Richard Leff, Esq. McGivney & Kluger, PC 80 Broad Street New York, New York 10004 RLeff@mcgivneyandkluger.com

Brian A. Bender, Esq.
Stanley Goos, Esq.
HARRIS BEACH PLLC
100 Wall Street
23rd Floor
New York, New York 10005
bbender@harrisbeach.com
sgoos@harrisbeach.com

Attorneys for Hudson Towers Housing Co. Inc. and Lefrak Organization, Inc.

William J Smith, Esq.
Faust Goetz Schenker & Blee, LLP
2 Rector Street
20th Floor
New York, New York 10006
wsmith@fgsb.com

Richard A Williamson, Esq.
Tom Egan, Esq.
M. Bradford Stein, Esq.
Flemming Zulack Williamson Zauderer LLP
One Liberty Plaza
35th Floor
New York, New York 10006-1404
RWilliamson@fzwz.com
TEgan@fzwz.com

Philip Goldstein McGuire Woods 1345 Avenue of the Americas, 7<sup>th</sup> Floor New York, NY 10105 pgoldstein@mcguirewoods.com